

ROUTING AND RECORD SHEET

SUBJECT: (Optional)

Use of Agency Seal

STAT^{CM}:

7B24 Hqs

AO/OCA

NO.

DDA 89-1003x

DATE

6 June 1989

TO: (Officer designation, room number, and building)

DATE

RECEIVED

FORWARDED

OFFICER'S
INITIALS

COMMENTS (Number each comment to show from whom to whom. Draw a line across column after each comment.)

1. EXA/DDA
7D18 Hqs

7 JUN 1989

HS

STAT:

3. Registry (File)

4.

5.

6.

7.

8.

9.

10.

11.

12.

13.

14.

15.

Log 16

6 June 1989

MEMORANDUM FOR: Director of Logistics
THROUGH: Executive Assistant/DDA
SUBJECT: Use of Agency Seal
FROM: AO/Office of Congressional Affairs

STAT

As set forth in Regulation [] permission is hereby requested to have business cards printed using the Agency seal (see attached sample business card) for the following:

STAT
STAT

E. Norbert Garrett, Director/Office of Congressional Affairs
[] Deputy Director/Office of Congressional affairs
[] Deputy Director/House Affairs.

Please advise of requirements, if any, attached to the procedure for ordering such business cards.

STAT

If any further information is required concerning this request, please call the undersigned on []

Page Denied

DDA 89-1004

9 June 1989

STAT

MEMORANDUM FOR: [REDACTED]

FROM:

Secretary to the Executive Assistant to the DDA

SUBJECT:

Using the Agency Seal on Business Cards

REFERENCE:

Your Memorandum for the D/L dtd 6 June 1989,
Subject: Use of Agency Seal

STAT

STAT

1. Per your request for the use of the Agency Seal in the printing of business cards for [REDACTED] I am attaching a memo to the DDCI from the then General Counsel, David P. Doherty, regarding the use of printing business cards at government expense. I hope this will help you in making your decision about the printing of business cards.

STAT

2. I note from the attached that [REDACTED] had business cards printed for her. I don't know what year this was done. The question that comes to mind is "did P&PG print them? In the past few years we have been denying the printing of business cards for other than OP recruiters as stated in the OGC memo.

3. As you can understand we receive several requests for printing of individual business cards throughout the Agency. If we didn't draw the line somewhere everybody would want their personal business card, and P&PG would be so busy printing cards they wouldn't be able to do anything else.

STAT

4. [REDACTED], the EXA/DDA is the approving official for all printing requests on the Form 70. He is on leave until 5 July. If you have any further questions please feel free to call me and I will get you in touch with someone else to help you.

Thanks,

STAT

STAT

Attachment:
As Stated

ORIG: O/EXA/DDA [REDACTED]

Distribution:

Orig - Adse w/att

1 - DDA Subject w/att

1 - DDA Chron w/o att

OGC 86-52662
15 October 1986

MEMORANDUM FOR: Deputy Director of Central Intelligence

FROM: David P. Doherty
General Counsel

SUBJECT: Business Cards Produced at Government Expense

1. The Office of Personnel has requested our opinion on a proposal to provide Agency recruiters with business cards produced at government expense. OP intends to require that recruiters have the cards available and provide them to potential applicants along with other recruiting materials. The cards will be produced by Printing and Photography Division to assure uniformity, and recruiters will be instructed that the cards are to be used for official purposes only. I find that this proposal is an authorized expenditure of appropriated funds. However, I felt that you should be informed of this new proposal as it differs from previous requests for business cards that have been rejected by this Office in the past based on long-standing Comptroller General opinions.

2. The General Accounting Office has followed a rule, dating back to 1913, that business cards are a personal convenience, and cannot be procured with government funds in the absence of specific statutory authority. This rule has been applied without further analysis in numerous opinions in which the Comptroller General has denied requests by individual employees or agencies who sought to provide cards at government expense, or to reimburse employees who purchased the cards themselves. In the past, the Office of General Counsel has followed those decisions and denied approval to use appropriated funds for such purposes.

3. The substantial difference in the current OP proposal is that the Agency has determined that the use of business cards is essential to effective recruiting efforts and will, as a matter of policy, require recruiters to have and use them. The Comptroller General noted in a 1923 application of

the "business card" rule that a Government requirement for the use of the items in question (in that case photographs for identification cards) was distinguished from personal use of business cards. That opinion held that an employee could be reimbursed for an item that is required in connection with official business.

4. I find that the current OP proposal to print business cards at government expense is within the Agency's legal authority and is consistent with GAO opinions that have found other uses of business cards to be a personal expense. I intend to advise the Office of Personnel that they may proceed unless you have objections to this proposal.

STAT

David P. Doherty

STAT

CONCUR:

Deputy Director of Central Intelligence

22 Oct 86
Date